

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE WAWA, INC. DATA SECURITY  
LITIGATION**

**Case No. 2:19-cv-06019**

**The Honorable Gene E.K. Pratter**

*This Document Applies to the  
Financial Institutions Track*

**FINANCIAL INSTITUTION PLAINTIFFS' UNOPPOSED MOTION FOR AN  
ORDER AUTHORIZING NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

Financial Institution Plaintiffs Inspire Federal Credit Union, Insight Credit Union, and Greater Cincinnati Credit Union ("FI Plaintiffs") respectfully move the Court for an Order:

- 1) indicating that the Court finds the proposed Settlement Agreement meets the criteria for preliminary approval and authorization of issuance of Notice to the Settlement Class;
- 2) approving the proposed Notice Plan and Class Notice as providing the best notice that is practicable under the circumstances;
- 3) indicating the Court will likely certify the proposed Settlement Class in conjunction with final approval of the Settlement Agreement;
- 4) conditionally appointing FI Plaintiffs as Settlement Class Representatives;
- 5) conditionally appointing the Interim Co-Lead Class Counsel and Interim Liaison team as Class Counsel and Liaison Counsel for the Settlement Class;
- 6) appointing Analytics Consulting LLC as the Settlement Administrator;
- 7) staying this Action pending Final Approval; and
- 8) scheduling a Final Approval Hearing.

Defendant does not oppose this Motion.

In support of this motion, the FI Plaintiffs refer to the accompanying memorandum of law in support; the declarations of Gary F. Lynch and Richard W. Simmons, and the exhibits attached thereto, including the Settlement Agreement and its associated exhibits.

Dated: March 10, 2023

Respectfully submitted,

/s/ Gary F. Lynch

Gary F. Lynch (PA ID 56887)

Jamisen A. Etzel

Elizabeth Pollock Avery

**LYNCH CARPENTER, LLP**

1133 Penn Avenue, 5th Floor

Pittsburgh, PA 15222

Telephone: (412) 322-9243

Email: gary@lcllp.com

Email: jamisen@lcllp.com

Email: elizabeth@lcllp.com

Christian Levis (*pro hac vice*)

Amanda G. Fiorilla (*pro hac vice*)

**LOWEY DANNENBERG, P.C.**

44 South Broadway, Suite 1100

White Plains, NY 10601

Telephone: (914) 997-0500

Email: clevis@lowey.com

Email: afiorilla@lowey.com

Anthony M. Christina (PA ID 322528)

**LOWEY DANNENBERG, P.C.**

One Tower Bridge

100 Front Street, Suite 520

West Conshohocken, PA 19428

Telephone: (215) 399-4770

Email: achristina@lowey.com

Jeannine M. Kenney (PA ID 307635)

**HAUSFELD LLP**

325 Chestnut St #900

Philadelphia, PA 19106

Telephone: (215) 985-3270

Email: jkenney@hausfeld.com

*Interim Co-Lead Class Counsel for Financial Institution  
Plaintiffs*

Mindee J. Reuben (PA ID 75308)  
**LITE DEPALMA GREENBERG & AFANADOR, LLC**  
1835 Market Street  
Suite 2700  
Philadelphia, PA 19103  
Telephone: (267) 314-7980  
Email: mreuben@litedepalma.com

*Interim Liaison Counsel for Financial Institution Plaintiffs*

Amy E. Keller (*pro hac vice*)  
**DICELLO LEVITT GUTZLER LLC**  
Ten North Dearborn Street, Eleventh Floor  
Chicago, Illinois 60602  
Telephone: (312) 214-7900  
Email: akeller@dicellolevitt.com

Richard Golomb (PA ID 42845)  
Kenneth J. Grunfeld (PA ID 84121)  
**GOLOMB SPIRT GRUNFELD, P.C.**  
1835 Market Street, Suite 2900  
Philadelphia, PA 19103  
Telephone: (215) 985-9177  
Email: rgolomb@golomblegal.com  
Email: kgrunfeld@golomblegal.com

Karen H. Riebel (*pro hac vice*)  
**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**  
100 Washington Avenue S, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 339-6900  
Email: khriebel@locklaw.com

Bryan L. Bleichner (*pro hac vice*)  
**CHESTNUT CAMBRONNE PA**  
100 Washington Avenue South, Suite 1700  
Minneapolis, MN 55401  
Telephone: (612) 339-7300  
Email: bbleichner@chestnutcambronne.com

Charles E. Schaffer (PA ID 76259)  
**LEVIN SEDRAN & BERMAN, LLP**  
510 Walnut Street – Suite 500  
Philadelphia, PA 19106-3697  
Telephone: (215) 592-1500

Email: [cschaffer@lfsblaw.com](mailto:cschaffer@lfsblaw.com)

Richard L. Coffman (*pro hac vice*)

**THE COFFMAN LAW FIRM**

Edison Plaza

350 Pine Street, Suite 700

Beaumont, TX 77701

Telephone: (409) 833-7700

Email: [rcoffman@coffmanlawfirm.com](mailto:rcoffman@coffmanlawfirm.com)

Brian C. Gudmundson (*pro hac vice*)

Michael J. Laird (*pro hac vice*)

**ZIMMERMAN REED LLP**

1100 IDS Center, 80 South 8th Street

Minneapolis, MN 55402

Telephone: (612) 341-0400

Email: [brian.gudmundson@zimmreed.com](mailto:brian.gudmundson@zimmreed.com)

Email: [michael.laird@zimmreed.com](mailto:michael.laird@zimmreed.com)

*Additional Counsel for Financial Institution Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Gary F. Lynch, hereby certify that on March 10, 2023, I filed and served through the Court's ECF system a true and correct copy of the foregoing document. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of this Court's electronic filing system.

/s/ Gary F. Lynch  
Gary F. Lynch (PA ID 56887)  
**LYNCH CARPENTER, LLP**